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May 27, 2022

**VIA ECF**

Magistrate Judge Sanket J. Bulsara  
United States District Court Judge  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Daniel Presti and Louis Gelormino v. City of New York, et al., 1:21-cv-03811 (PKC)(SJB)

Dear Magistrate Judge Bulsara:

I am the Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing Defendants the City of New York, et al. in the above-referenced matter. With the consent of Plaintiffs' counsel, Defendants respectfully request a 30-day extension of discovery to July 6, 2022.

On April 4, 2022, the Court granted the parties' request to extend discovery by 60 days to June 6, 2022 to allow for depositions to be completed. Thus far, counsel has completed four depositions, and scheduled additional depositions between May 18 and May 27, which were to be conducted in person. However, on May 18, counsel for Defendants became ill and tested positive for COVID-19, and all scheduled depositions were canceled. The parties request this extension of discovery in order to complete the remaining depositions.

To my knowledge, the April 4 request for an extension of discovery is the only such request that has been made in this matter. Accordingly, I respectfully request, with the consent of Plaintiffs' counsel, that the Court grant the relief sought herein.

Sincerely,

**Joseph Pepe, Esq.**  
Assistant Corporation Counsel